# Kansas Department of Health and Environment Bureau of Waste Management Policy 2012-P3

## **Use of Day Accumulation Containers**

#### Purpose

This policy clarifies the Kansas Department of Health and Environment's (KDHE's) regulatory interpretation of the use of Day Accumulation Containers by hazardous waste generators.

### **Background**

KDHE has allowed the use of Day Accumulation Containers for several years. Previously, KDHE asked generators to notify the KDHE Bureau of Waste Management when they wanted to use a Day Accumulation Container and whenever the locations of those containers changed inside their facility. During this time, KDHE has had numerous conversations with the United States Environmental Protection Agency (EPA) Region VII regarding the KDHE's interpretation on the use of Day Accumulation Containers. KDHE is now confident that EPA concurs with the KDHE interpretation and that notification by generators will no longer be necessary.

#### **Action**

KDHE will continue to offer hazardous waste generators the flexibility to use Day Accumulation Containers at their facility. KDHE will no longer ask for notification for the use of these containers.

Day Accumulation Containers may be used by generators of hazardous waste in Kansas, and they should meet all container management requirements for satellite accumulation containers. Additionally, Day Accumulation Containers must be emptied into a satellite accumulation container at the end of each working shift in order to avoid the more stringent requirements of satellite accumulation containers and storage containers.

William L. Bider

Director, Bureau of Waste Management

Date